


UNITED STATES DISTRICT COURT

for the  
Western District of Virginia

MAR 16 2016

JULIA C. DUDLEY, CLERK  
BY:  DEPUTY CLERK

United States of America  
v.  
Felix Ayo CAMPBELL

Case No.

716 MJ 40

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

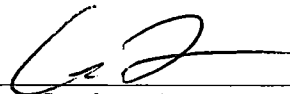
On or about the date(s) of 03/14/2016 in the county of Roanoke in the  
Western District of Virginia, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 21 USC 841(a)(1)	Possession With Intent to Distribute a Controlled Substance (Cocaine)
Title 18 USC 922(g)(1)	Possession of a Firearm by a Previously Convicted Felon
Title 18 USC <sup>9</sup> 824(c)	Possession of a Firearm in Furtherance of a Drug Trafficking Crime

This criminal complaint is based on these facts:

See Attached.

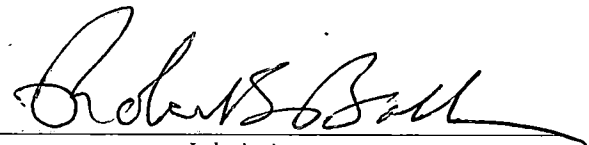
☒ Continued on the attached sheet.

  
Complainant's signature

Task Force Officer Craig Frye  
Printed name and title

Sworn to before me and signed in my presence.

Date: 03/16/2016

  
Judge's signature

City and state: Roanoke, VA

United States Magistrate Judge Robert Ballou  
Printed name and title

## Affidavit

I, Craig Frye, being duly sworn, depose and state the following:

I, Craig Frye, am a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), a part of the United States Department of Justice, and have been so employed since March, 2008. I have been a sworn Police Officer with the Town of Vinton since August, 2004. I am currently assigned to the Roanoke, Virginia ATF Field Office and am charged with investigating violations of Federal firearms, narcotics, arson and explosive laws. Prior to my current assignment, I was in the vice unit for the Town of Vinton for approximately 1½ years, and a Patrol Officer for 3 ½ years. I was previously employed at Radford City Department of Police as a Police Officer for approximately 2 ½ years. During this time I have conducted and participated in; numerous firearms, narcotics, and violence related investigations; arrested a large number of criminal offenders; and have applied for and executed numerous state and federally issued search warrants.

As a result of my training and experience as an ATF Task force Officer, I am familiar with Federal criminal laws and know that it is a violation of:

Title 21 USC, Section 841(a)(1) Possession With Intent to Distribute Cocaine.

Title 18 USC, Section 922(g)(1) Possession of a Firearm by a Previously Convicted Felon

Title 18 USC, Section 924(c) Possession of a Firearm in Furtherance of a Drug Trafficking Crime.

The information contained in this affidavit is based on my knowledge of this investigation and other facts provided to me by others. I have not included all the facts of this investigation in this affidavit, but only enough to establish probable cause.

1. On 03/14/2016, Members of the Roanoke Valley HIDTA and ATF Roanoke executed a narcotics related state search warrant for the residence of Felix Ayo CAMPBELL (B/M; DOB [REDACTED] 1976; SSN [REDACTED] 1294; FBI#: 868000WA3) located at [REDACTED] Roanoke, VA.
2. Prior to the execution of the search warrant, the apartment was surveilled and CAMPBELL was observed leaving the residence. CAMPBELL was stopped and detained by law enforcement a short distance away.
3. The following individuals were located inside the residence during the execution of the search warrant: Yachica Keona Becks, and her three (3) year old son.

*[Handwritten signature]*  
3/14/2016

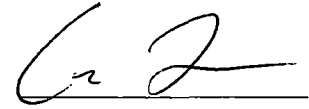
4. The following evidence was located and seized during the search of the residence:
  - a. approximately 3 ounces of suspected cocaine (crack and cocaine HCL), field tested positive for presence of cocaine
  - b. Smith and Wesson, model SW9VE, 9mm caliber semiautomatic pistol, serial number PBZ5350 with a loaded magazine
  - c. Sig Sauer, model P220ST, .45 caliber semiautomatic pistol, serial number G343812, with a loaded magazine.
  - d. digital scales, Pyrex measuring cup, plastic bags and other drug trafficking paraphernalia.
5. CAMPBELL was read, and waived, his Miranda Rights via a pre-printed card and agreed to speak to detectives. CAMPBELL admitted to purchasing the firearms, located inside his apartment, for protection. CAMPBELL further admitted that the cocaine and crack located inside the apartment was his, and that he would purchase four (4) ounces of cocaine, on a weekly basis, for redistribution.
6. A query of CAMPBELL's NCIC revealed multiple felony convictions, including a 1999 Federal drug trafficking and felon in possession of a firearm convictions out of the Western Judicial District of Virginia.
7. On 03/15/2016, Special Agent and Interstate Nexus Expert Keith Teehan was provided a description of the above listed firearms and determined they were both firearms and both have moved in interstate commerce.

The facts and information contained in this affidavit are based upon my personal knowledge as well as knowledge and observations obtained from other law enforcement officials involved in this investigation. I am thoroughly familiar with the information contained in this affidavit through personal exposure to the records, reports, and discussions with other law enforcement personnel. The facts comprising the basis for this affidavit are true and correct, to the best of my knowledge.

Based on my knowledge, training, and experience, the preceding information set forth in this Affidavit constitutes supportive evidence that:

CAMPBELL possessed cocaine and cocaine base with the intent to distribute, in violation of Title 21, USC, Section 841(a)(1); Possession of a Firearm after Being Convicted of a Felony in violation of Title 18 USC, Section 922(g)(1); and Possession of a Firearm in Furtherance of a Drug Trafficking Crime in violation of Title 18 USC, Section 924(c); and that the aforementioned violations took place in the County of Roanoke, in the Western District of Virginia.

*1/8/16*  
*1/16/2016*



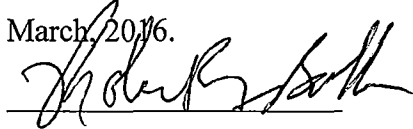
Task Force Officer Craig Frye

ATF-Roanoke, VA.

Sworn and subscribed to

Before me this 16<sup>th</sup> day of

March, 2016.



Robert S. Ballou

United States Magistrate Judge